

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

NVER TADEVOSYAN and LALA  
TADEVOSYAN,

Plaintiffs,

v.

SAFECO INSURANCE COMPANY OF  
AMERICA, and DOES 1 through 50, inclusive,

Defendants.

Case No. 1:22-CV-01631-JLT-EPG

STIPULATION TO MODIFY SCHEDULING  
ORDER AND ORDER

(ECF No. 19)

Plaintiffs Nver Tadevosyan and Lala Tadevosyan (“Plaintiffs”) and Defendant Safeco Insurance Company of America (“Safeco”) (collectively “the Parties”), through their attorneys of record, hereby jointly submit this stipulation to modify the discovery deadlines set forth in the Court’s scheduling order of March 30, 2023, subject to the Court’s approval.

WHEREAS, on March 30, 2023, the Court issued its Scheduling Conference Order (Dkt. 11);

1 WHEREAS, relevant parts of the Court's scheduling order, set forth the following case  
2 schedule:

3	Nonexpert Discovery Cutoff [Friday]:	April 29, 2024
4	Expert Disclosure:	May 29, 2024
5	Rebuttal Expert Disclosure:	July 1, 2024
6	Expert Discovery Cutoff:	July 29, 2024
7	Dispositive Motion Filing Deadline:	September 13, 2024
8	Settlement Conference Deadline:	TBD
9	Pretrial Conference:	January 13, 2025
10	Jury Trial:	March 18, 2025

11 WHEREAS, the Parties have been continuing to engage in discovery, including written  
12 discovery, third party discovery and the noticing of depositions;

13 WHEREAS, on April 11, 2024, the Parties requested a modification of the fact discovery  
14 cutoff (Dkt 17), and the Court granted the request on April 15, 2024, setting the fact discovery  
15 cutoff as July 29, 2024 (Dkt. 18);

16 WHEREAS, due to an oversight, when the Parties requested a continuance of the fact  
17 discovery cutoff, the Parties mistakenly failed to seek a corresponding continuance of the expert  
18 discovery schedule;

19 WHEREAS, fact discovery will be used in expert reports such that the Parties agree, and  
20 respectfully request, that the dates for initial expert disclosures, rebuttal expert disclosures, and  
21 expert discovery cutoff be extended for a duration corresponding with the previous extension of  
22 the fact discovery cutoff date;

23 WHEREAS, therefore, the Parties respectfully request a continuance of the expert  
24 discovery schedule as follows:

25	Expert Disclosure:	August 12, 2024
26	Rebuttal Expert Disclosure:	August 26, 2024
27	Expert Discovery Cutoff:	September 9, 2024

1 WHEREAS, continuing the expert discovery schedule will not affect the dispositive  
2 motion filing deadline, the pretrial conference date, or the trial date.

3 THEREFORE, the parties, by and through their respective counsel of record, agree and  
4 stipulate and respectfully request the Court's approval.

5 IT IS SO STIPULATED.

6 Dated: May 21, 2024

WILKINS DROLSHAGEN & CZESHINSKI LLP

7  
8 By: /s/ James H. Wilkins

James H. Wilkins

9 Attorneys for Plaintiffs, NVER and LALA  
10 TADEVOYSAN

11  
12  
13 Dated: May 21, 2024

MAYNARD NEXSEN LLP

14  
15  
16 By: /s/ Nicholas J. Boos\*

Nicholas J. Boos

Corban J. Porter

17 Attorneys for Defendant SAFECO  
18 INSURANCE COMPANY OF AMERICA

19  
20 \* Pursuant to L.R. 5-4.3.4(2)(i), the filer attests that all signatories listed, and on whose behalf  
21 the filing is submitted, concur in the filing's content and have authorized the filing.

**ORDER**

Based on the parties' stipulation (ECF No. 19), the Court modifies the current scheduling order to grant the parties' request as follows:

The current discovery deadlines be modified such that the new expert discovery schedule shall reflect as follows:

Expert Disclosure: August 12, 2024

Rebuttal Expert Disclosure: August 26, 2024

Expert Discovery Cutoff: September 9, 2024

All remaining pretrial and trial dates shall remain consistent with the March 30, 2023 Scheduling Order as modified by the Court's Order dated April 15, 2024. (ECF Nos. 11, 18).

IT IS SO ORDERED.

Dated: May 22, 2024

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE